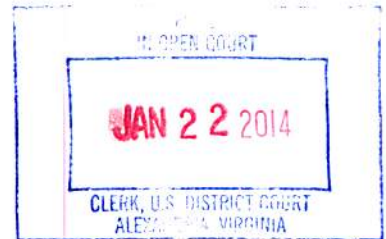


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

GEORGE WILLIAMS,
a.k.a. "Champ,"

Defendant.

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)
) Case No. 1:13cr350 — (04)
)
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)
)

STATEMENT OF FACTS

The United States and the defendant, George Williams, agree that had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. "Nine Trey Gangster Bloods" (NTG) is a criminal street gang operating within the Eastern District of Virginia. Members and associates of NTG were engaged in a racketeering conspiracy involving the unlawful distribution of cocaine base and other illegal narcotics, as well as robbery and other crimes of violence. Members and associates of NTG were also engaged in the sex trafficking of adults by coercion or force from at least in and around 2011 to in and around August 2013.

2. The defendant, George Williams, also known as "Champ" is a NTG gang member and performed acts in furtherance of the gang's mission. The defendant was the "Low Stain" or "OOG" within the Northern Virginia Line-up of NTG and served closely with co-conspirator Thaddeus Snow. Specifically, the defendant participated in violent acts to further the gang's interests, distributed marijuana to other gang members, and furthered the sex trafficking activities of the gang by transporting prostitutes throughout the region for commercial sex acts.

3. On or about April 12, 2010, the defendant, along with co-conspirators William Sykes and Markeith Kerns, confronted other young men outside of a school with whom they had an ongoing dispute in Fauquier County, Virginia. The defendant knew the background of the dispute and was present to back-up fellow gang members Sykes and Kerns. The defendant knew that Sykes and Kerns carried firearms and it was foreseeable to him that the dispute would escalate to a shooting. Indeed, the defendant's co-conspirators discharged firearms several times at the young men and their car. The shots struck the car several times and grazed the clothing of one of the young men.

4. The leadership of the gang sold illegal narcotics, including crack cocaine, powder cocaine and marijuana in order to make money. The defendant distributed marijuana on behalf of the gang.

5. In 2011, the defendant along with co-conspirator Thaddeus Snow and other co-defendants sought to assault another gang member because the gang member wanted to leave the Northern Virginia "line-up."

6. On or about September 17, 2012, the defendant made statements concerning the purchase of a pound of marijuana using counterfeit U.S. currency.


7. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

8. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by accident, mistake, or other innocent reason.

Respectfully submitted,

Dana J. Boente
Acting United States Attorney


By:


Adam B. Schwartz
Dennis M. Fitzpatrick
Assistant United States Attorneys

Defendant's Stipulation and Signature: After consulting with my attorney and pursuant to the plea agreement I entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Date:


1/19/14


George Williams
Defendant

Defense Counsel's Signature: I have carefully reviewed the above statement of facts with my client, George Williams. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date:

1/19/14


Lavonda Graham-Williams
Counsel for the Defendant